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July 14, 2023

VIA ECF

Magistrate Judge Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Singer, et al. v. Bank of Palestine*, 19-cv-006 (ENV) (RML)

Dear Judge Levy:

In accordance with the Court's June 1, 2023, minute order, we write on behalf of all parties to provide a further status report concerning the additional review of Tape 6 by an independent vendor ("FRA").

As reported in the parties' previous joint status report, ECF No. 113, they instructed FRA to run a set of two test keyword searches (relating to an account held at BOP during the relevant period) to determine the extent to which FRA can identify and extract SWIFT transactions from Tape 6 without attempting to reconstruct the database on the tape.

FRA has run that search and then held a teleconference with the parties on June 30 to discuss the results (although it has not yet produced a Hit Count Report, a Generalized Search Results Report, and other technical information requested by the parties).

Following the June 30 teleconference, Plaintiffs have raised additional technical questions to FRA and, given the relatively low expense involved, have proposed to BOP that FRA search Tape 6 using the remaining account numbers currently at issue. The parties and FRA have scheduled another call for Tuesday, July 18, to discuss these issues and next steps concerning the review, and the parties will continue to meet and confer regarding these issues.

The parties respectfully propose to submit a further status report no later than September 8, 2023.

Respectfully submitted,

/s/ Michael Radine

cc: All counsel of record (via ECF)